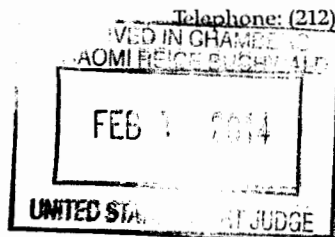




MEMO ENDORSED

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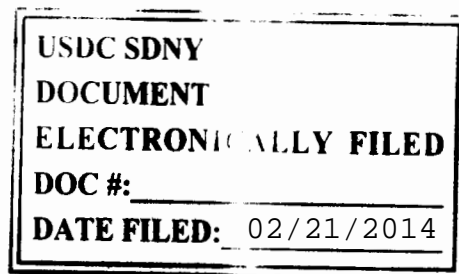


MEMO ENDORSED

February 18, 2014

**VIA ECF & FAX**

Hon. Naomi Reice Buchwald, U.S.D.J.  
United States District Court, S.D.N.Y.  
500 Pearl St.  
New York, NY 10007



**Re:** *Chhab, et al v. Darden Restaurants, Inc. et al.*  
*Civil Action No.: 11 Civ. 08345 (NRB)(JLC)*  
*F&S File No.: 66-262*  
*Assigned Attorney: Joseph A. Fitapelli*

Dear Judge Buchwald:

We represent Plaintiffs and the putative class in the above referenced matter. We write this letter with Defendants to provide the Court with an update of the parties' plan for discovery. On February 11, 2014, the parties had an in-person meeting where the parties agreed to the following:

1. Each side will be limited to a maximum of 25 depositions;
2. For each Capital Grille Plaintiff that Defendants' depose, Defendants will supply Plaintiffs' Counsel with employee folders, time records, tip records and wage and hour documents for the deponent's employment during the applicable statute of limitations period;
3. Defendants will supply Plaintiffs with documents related to side work for all Capital Grille locations; and
4. The parties have met and conferred regarding document discovery. In that regard, Plaintiffs will follow up with Defendants, in writing, for specific categories of documents.

The parties estimate that discovery can be completed by December 31, 2014.

We thank the Court for its time and attention to this matter.

MEMO ENDORSED

Endorsement

Given the length of the proposed schedule, the parties should proceed on the assumption that no extensions will be granted. Further, the parties should provide the Court with an update on their progress every sixty (60) days. So ordered.  
Hon. Naomi Reice Buchwald, U.S.D.J. 2/20/14

Fitapelli & Schaffer, LLP  
February 18, 2014  
Page 2 of 2

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Respectfully yours,



Joseph A. Fitapelli

Cc: Counsel of record (via ECF)